## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re LEHMAN BROTHERS HOLDINGS INC., et al., Debtors.	Chapter 11 Case No. 08-13555 (JMP) (Jointly Administered)
In re LEHMAN BROTHERS INC., Debtor.	() () () () () () Case No. 08-01420 (JMP) SIPA () ()

## SUPPLEMENTAL DECLARATION OF EMIL A. KLEINHAUS IN SUPPORT OF JPMORGAN'S MOTION TO STRIKE

Emil A. Kleinhaus, pursuant to 28 U.S.C. § 1746, declares as follows:

- 1. I am a partner at the law firm of Wachtell, Lipton, Rosen & Katz, counsel for JPMorgan Chase Bank, N.A. ("JPMorgan"), the claimant named in the *Objection to Portions of Proofs of Claim No. 66462 Against Lehman Brothers Holdings Inc. and No. 4939 Against Lehman Brothers Inc. of JPMorgan Chase Bank, N.A. Regarding Triparty Repo-Related Losses* (the "Objection"). As an attorney admitted to practice before this Court, and one of the attorneys appearing for JPMorgan in this claims objection proceeding, I respectfully submit this declaration to provide the Court a true and correct copy of the document listed below that is referenced in JPMorgan's reply in further support of JPMorgan's motion to strike portions of the Objection.
- 2. Annexed hereto as Exhibit A is a copy of the Stipulation and Consent

  Order (I) Governing Interim Production of Documents and (II) Adjourning Remainder of Motion

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of Official Committee of Unsecured Creditors of Lehman Brothers Holdings, Inc., et al., for Leave to Conduct Discovery of JPMorgan Chase Bank, N.A. Pursuant to 11 U.S.C. §§ 105(A) and 1103(C) and Federal Rule of Bankruptcy Procedure Rule 2004, dated November 4, 2008, between the Official Committee of Unsecured Creditors of Lehman Brothers Holdings, Inc., et al., and JPMorgan Chase Bank, N.A..

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Emil A. Kleinhaus
Emil A. Kleinhaus

Dated: April 11, 2012

New York, New York